



U.S. Department of Energy
Office of River Protection

0058988

P.O. Box 450
Richland, Washington 99352

03-ED-035

MAR 04 2003

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

RECEIVED
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EDMC

Dear Mr. Wilson:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (HFFACO) CHANGE REQUEST M-92-03-01 REQUESTING DELETION OF HFFACO MILESTONE M-92-05; INCLUSION OF HANFORD SITE Cs/Sr "TREATMENT AND/OR REPACKAGING PARAMETERS" IN THE U.S. DEPARTMENT OF ENERGY (DOE), OFFICE OF RIVER PROTECTION (ORP) TANK WASTE REMEDIATION SYSTEM PHASE II REQUEST FOR PROPOSALS (TREATMENT AND/OR REPACKAGING OF ALL REMAINING Cs/Sr)

The attached change package (M-92-03-01) proposes the deletion of M-92-05 Milestone to achieve consistency with the path ORP is following to complete waste treatment by 2028. We propose to eliminate M-92-05, which relates to the Phase II treatment of the cesium and strontium capsules, for two reasons.

First, as you are aware, since the issuance of the Hanford Performance Management Plan, ORP has focused its mission planning and implementation activities on accelerating the retrieval, treatment, and final disposition of the Hanford tank wastes. For example, we have already taken steps to quadruple the vitrification capacity for the High-Level Waste (HLW) treatment facility. These and other acceleration initiatives result in a sufficiently capable Waste Treatment and Immobilization Plant (WTP) coming on line at the start of operations such that a Phase II WTP is no longer necessary. Accordingly, there will be no Phase II facility request for proposal as identified in the milestone.

Second, consistent with our Clean up, Constraints, and Challenges Team discussions, it is DOE's intention to remove the capsules from Waste Encapsulation and Storage Facility and place them into dry storage until such time as a final decision on disposition can be made. Activities related to the interim dry storage and the subsequent packaging and shipping the Cs/Sr capsules will be managed by DOE Richland Operations Office (RL). As such, the M-92-05 Milestone is inconsistent with ORP's planned path forward and we request that it be eliminated. DOE remains committed and accountable for ensuring appropriate final disposition of the capsules.

ORP and RL request the State of Washington Department of Ecology approval, through the attached M-92-03-01 Change Request, to delete the M-92-05 Interim Milestone and welcome the opportunity to discuss further should the need arise.

Mr. Michael A. Wilson
03-ED-035

-2-

MAR 04 2003

If you have any questions, please contact James E. Rasmussen, Environmental Division,
(509) 376-2247.

Sincerely,


Roy J. Schepens
Manager

ED:JER


Attachment

cc w/attach:

F. Beranek, BNI
B. G. Erlandson, BNI
R. F. Naventi, BNI
E. S. Aromi, CHG
C. J. Kemp, CHG
J. J. Luke, CHG
L. L. Penn, CHG
K. Tollefson, CHG
J. Cox, CTUIR
J. Wilkinson, CTUIR
L. Cusack, Ecology
S. L. Dahl, Ecology
J. L. Hensley, Ecology
J. J. Lyon, Ecology
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N. Ceto, EPA
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R. Morrison, FHI
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J. L. Hanson, INNOV
D. Powauke, NPT
P. Sobotta, NPT
K. Niles, ODOE
J. B. Hebdon, RL
K. A. Klein, RL
A. W. Conklin, WDOH
R. Jim, YN
TPA Administrative Record
Environmental Portal, LMSI

**Attachment
03-ED-035**

**Federal Facility Agreement and Consent Order
Change Control Form for M-95-03-01**

Change Number	Federal Facility Agreement and Consent Order Change Control Form		Date:						
M-92-03-01	Do not use blue ink. Type or print using black ink.		March 4, 2003						
Originator: ORP		Phone:							
Class of Change:									
<input type="checkbox"/> I - Signatories		<input checked="" type="checkbox"/> II - Executive Manager	<input type="checkbox"/> III - Project Manager						
Change Title:									
Delete Hanford Federal Facility Agreement and Consent Order (HFFACO) Interim Milestone M-92-05, Inclusion of Hanford Site Cs/Sr "Treatment and/or Repackaging Parameters" in DOE TWRS Phase II Request for Proposals (Treatment and/or Repackaging of all remaining Cs/Sr), as it currently exists within the responsibility of the Office of River Protection (ORP)									
Description/Justification of Change:									
<p>The DOE Tank Waste Remediation System (TWRS) Phase I and Phase II language is no longer consistent with the current ORP waste cleanup strategy for accelerated retrieval, treatment and final disposition of the Hanford tank wastes. Steps to increase the vitrification capacity for high-level waste (HLW) result in a sufficiently capable waste treatment plant (WTP) such that a Phase II WTP is no longer necessary. Therefore, a Phase II Request for Proposals will not be issued. A new strategy for disposition of the Cs/Sr capsules has been defined within the DOE-RL Program Management Plan. The old strategy for disposing Cs/Sr capsules by processing in the WTP introduces significant worker, public, environmental and technical risks for the WTP and is not necessarily cost effective. The proposed new strategy is to move (in the near term) Cs/Sr capsules from pool storage in WESF to dry storage, until such time as they can be packaged for shipment to, and disposal at the national high-level waste geologic repository.</p> <p>Modifications to the M-92-05 milestone incorporated into the HFFACO by approval of this M-92-03-01 Change Request are shown here as either shaded additions, or strikethrough deletions.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">MS Number</th> <th style="width: 65%;">Milestone Description</th> <th style="width: 20%;">Due Date</th> </tr> </thead> <tbody> <tr> <td>M-92-05-</td> <td>INCLUSION OF HANFORD SITE Cs/Sr TREATMENT AND/OR RE-PACKAGING PARAMETERS IN DOE TWRS PHASE II REQUEST FOR PROPOSALS (TREATMENT AND/OR REPACKAGING OF ALL REMAINING Cs/Sr).</td> <td>June 30, 2003</td> </tr> </tbody> </table>				MS Number	Milestone Description	Due Date	M-92-05-	INCLUSION OF HANFORD SITE Cs/Sr TREATMENT AND/OR RE-PACKAGING PARAMETERS IN DOE TWRS PHASE II REQUEST FOR PROPOSALS (TREATMENT AND/OR REPACKAGING OF ALL REMAINING Cs/Sr).	June 30, 2003
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Impact of Change:									
Delete required Phase II Request for Proposals. Move Cs/Sr capsules from pool storage in WESF to dry storage until they can be packaged for shipment to and disposal at the national high-level waste geologic repository. Dry storage is inherently safer and cheaper than wet storage. Dry storage, packaging and disposal will substantially reduce worker, public and environmental risks from processing capsules in the WTP, resulting in short and long-term cost savings that can be deployed for other site cleanup.									
Affected Documents:									
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).									
Approvals:									
 James E. Rasmussen, ORP		3/4/03 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved						
_____ Michael A. Wilson, Ecology		_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved						
_____		_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved						
_____		_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved						